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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

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| UNITED STATES OF AMERICA |) | |
| |) | CRIMINAL NO. 1:14CR388-JCM-GWF |
| |) | |
| v. |) | |
| |) | STIPULATION AND |
| |) | PROTECTIVE ORDER |
| STEPHANIE LIANE MARKHAM, |) | |
| |) | |
| Defendant. |) | |
| |) | |

IT IS HEREBY STIPULATED AND AGREED between the parties, William Stellmach, Acting Chief, U.S. Department of Justice, Criminal Division, Fraud Section, Deputy Chief Charles La Bella, and Trial Attorneys Thomas B.W. Hall and Alison L. Anderson, counsel for the United States, and Mark B. Bailus, counsel for the Defendant, Stephanie Liane Markham, that this Court issue an Order protecting from disclosure to the public any discovery documents containing the personal identifying information such as social security numbers, drivers license numbers, dates of birth, bank account numbers, bank records, or addresses of participants, witnesses and victims in this case. Such documents shall be referred to hereinafter as "Protected Documents." The parties state as follows:

1. Protected Documents which will be used by the government in its case in chief include personal identifiers, including social security numbers, driver's license numbers, dates

1 of birth, bank account numbers, bank records, and addresses of participants, witnesses, and
2 victims in this case.

3 2. Discovery in this case will be voluminous. Many of these documents include
4 personal identifiers. Redacting the personal identifiers of participants, witnesses, and victims
5 would prevent the timely disclosure of discovery to defendants.

6 3. The United States agrees to provide Protected Documents without redacting the
7 personal identifiers of participants, witnesses, and victims.

8 4. Access to Protected Documents will be restricted to persons authorized by the
9 Court, namely defendants, attorneys of record and attorneys' paralegals, investigators, experts,
10 and secretaries employed by the attorneys of record and performing on behalf of the defendants.

11 5. The following restrictions will be placed on defendants, defendants' attorneys
12 and the above-designated individuals unless and until further ordered by the Court. Defendants,
13 defendants' attorneys and the above-designated individuals shall not:

14 a. make copies for, or allow copies of any kind to be made by any other
15 person of Protected Documents;

16 b. allow any other person to read Protected Documents; and

17 c. use Protected Documents for any other purpose other than preparing to
18 defend against the charges in the Indictment or any superseding indictment arising out of this
19 case.

20 6. Defendants' attorneys shall inform any person to whom disclosure may be made
21 pursuant to this order of the existence and terms of this Court's order.

22 7. The requested restrictions shall not restrict the use or introduction as evidence of
23 discovery documents containing personal identifying information such as social security
24 numbers, driver's license numbers, dates of birth, and addresses during the trial of this matter.

8. Upon conclusion of this action, defendants' attorneys shall return to government
counsel or destroy and certify to government counsel the destruction of all discovery documents
containing personal identifying information such as social security numbers, drivers license

1 numbers, dates of birth, and addresses within a reasonable time, not to exceed thirty days after
2 the last appeal is final.

3
4 DATED this 23rd day of January, 2015.

5
6 /s/ Mark B. Bailus
7 MARK B. BAILUS
8 Counsel for Defendant

WILLIAM STELLMACH
Acting Chief, U.S. Department of Justice
Fraud Section, Criminal Division

9 /s/ Alison L. Anderson
10 ALISON L. ANDERSON
11 Trial Attorney, U.S. Dept. of Justice
12 Criminal Division, Fraud Section

13 **ORDER**

14 IT IS SO ORDERED this 26th day of January, 2015.

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18 UNITED STATES MAGISTRATE JUDGE
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1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

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4 UNITED STATES OF AMERICA)
5) CRIMINAL NO. 1:14CR388-JCM-GWF
6 v.)
7) CERTIFICATE OF SERVICE
8 STEPHANIE LIANE MARKHAM,)
9)
10 Defendant.)
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10 I, the undersigned, hereby certify that this pleading was filed with the clerk of court via
11 ECF and will be served electronically via ECF on all parties that have entered their appearances
12 in this case.

13 Dated: January 23, 2015

15 WILLIAM STELLMACH
16 Acting Chief, U.S. Department of Justice
17 Fraud Section, Criminal Division

18 /s/ Alison L. Anderson
19 ALISON L. ANDERSON
20 Trial Attorney, U.S. Dept. of Justice
21 Criminal Division, Fraud Section
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